

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Mark E. West,)	
)	
Plaintiff,)	C/A NO.: 6:21-cv-01593-DCC-JDA
)	
vs.)	PLAINTIFF'S MOTION FOR
)	TELEPHONE CONFERENCE
Don Reynolds,)	
individually and as)	
Sheriff of Laurens)	
County, and Laurens)	
County,)	
)	
Defendants.)	

TO: RUSSELL W. HARTER, JR., ATTORNEY FOR DEFENDANTS

YOU WILL PLEASE TAKE NOTICE that ten (10) days after the service hereof, or at such time and place as the Court may deem appropriate, Plaintiff will move the Court, pursuant to Rule 37 of the *Federal Rules of Civil Procedure*, for a telephone conference hearing to discuss deficiencies in Defendants' interrogatory answers to Interrogatories Numbered 10 and 11.

Two interrogatories and responses that Plaintiff believes are deficient:

Interrogatory No. 10 Describe in detail any and all contact or interaction by and between Defendants and law enforcement personnel in Spartanburg County concerning the incident described in Plaintiff's Complaint.

Answer:

A. Pursuant to FRCP 33(d) see documents provided

and/or identified in this response and in response to plaintiff's Request for Production.

B. See documents identified in response to Interrogatory No. 2 and in defendants' responses to plaintiff's Requests for Production.

Interrogatory No. 11 Identify any prior investigation or arrest of the Plaintiff by Defendants at any time for any reason whatsoever.

Answer:

Inquiry is being made into Interrogatory No. 11.

It is Plaintiff's position that Interrogatory No. 10 asks for a description of the detailed interaction between the Defendants and law enforcement personnel in Spartanburg County. The answer is not responsive but simply refers Plaintiff to documents which we had obtained by FOIA. Plaintiff seeks to know about conversations, emails, etc., in short, everything germane to the interaction.

With respect to Interrogatory No. 11, the response was "inquiry is being made." These interrogatories were originally served five (5) months ago. Plaintiff's counsel was later informed by Defendants' counsel that he did not receive the Interrogatories and Requests for Production and asked for another copy. We therefore reserved Defendants' attorney and have now received the responses set forth above.

KNIE & SHEALY

/s/ Patrick E. Knie

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ATTORNEYS FOR PLAINTIFF

March 3, 2022

In accordance with Rule 11 of the *Federal Rules of Civil Procedure*, I affirm that I have communicated with opposing counsel and have attempted in good faith to resolve the matter contained in the motion.

/s/ Patrick E. Knie

Patrick E. Knie
Attorney for Plaintiff

